

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of)

The Impact of Advanced)
Television Technologies)
on Local Television)
Broadcasting)

RM-5811

To: The Commission

REQUEST FOR EXTENSION OF TIME

1. On March 27, 1987, the Federal Communications Commission ("Commission") released for public comment a Petition for Notice of Inquiry (RM-5811) filed by the Association of Maximum Service Telecasters, Inc. (AMST), the National Association of Broadcasters (NAB) and others concerning the impact of High Definition Television (HDTV) and other advanced television technologies on local television broadcasting (See Public Notice, Report No. 1650). Comments on the Petition for Notice of Inquiry currently are due at the Commission by May 11, 1987.

2. By Public Notice (No Report No.) released the same date, the Commission invited public comment on a

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related Petition for Special Relief filed by AMST et al., in a separate proceeding (Gen. Docket No. 87-172; In the Matter of Further Sharing of the UHF Television Band by Private Land Mobile Radio Services), asking the Commission to defer any action in that proceeding pending the inquiry into the development of HDTV.

3. In General Docket No. 85-172, the Commission also requested comment on certain staff documents, including: a Field Operations Bureau (FOB) working paper on 800 MHz land mobile channel occupancy, dated September 18, 1985; FOB underlying data for the September 18, 1985 working paper; 1986 FOB monitoring data (Atlanta); FOB "active/inactive" licensee survey (FY 1985); an Office of Engineering and Technology (OET) technical memorandum ("Two-Signal Cross Modulation Effects, Half-Effects and Interference Criteria in Land Mobile Sharing with UHF Television"), dated February, 1987; and an OET technical memorandum ("Receiver Susceptibility Relating to Interference Between UHF Television and Land Mobile Radio Services"), dated February, 1987.

4. The Land Mobile Communications Council (LMCC) acts on behalf of the vast majority of public safety,

business, industrial, land transportation and common carrier land mobile radio users, as well as a diversity of land mobile service providers and equipment manufacturers. LMCC represents its constituency before the Commission on a variety of communications issues.

5. LMCC submitted the original Petition for Rule-making that led the Commission to initiate General Docket No. 85-172. LMCC later filed extensive Comments and Reply Comments in that proceeding supporting the Commission's proposals. LMCC members also were active participants in the Technical Advisory Committee (TAC) established by the Commission to assist in resolving the technical issues presented.

6. LMCC is in the process of analyzing the voluminous documents released by the Commission in this proceeding and General Docket No. 85-172. In light of the complex issues raised and in the interests of developing as comprehensive a record as possible, LMCC respectfully requests an additional 30 days or until June 10, 1987, for commenting on the Petition for Notice of Inquiry in this proceeding.^{1/}

^{1/} By a separate Request for Extension of Time, LMCC also requests an additional 30 days to respond to the Petition for Special Relief and related Commission staff documents released on March 27, 1987, in General Docket No. 85-172.

7. Counsel for LMCC has been advised that counsel for the Association of Maximum Service Telecasters, Inc. and counsel for the National Association of Broadcasters interpose no objection to this request.

WHEREFORE, THE PREMISES CONSIDERED, the Land Mobile Communications Council urges the Commission to grant an extension of time until June 10, 1987, for filing Comments on the Petition for Notice of Inquiry in this proceeding.

Respectfully submitted,

LAND MOBILE COMMUNICATIONS COUNCIL

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Dated: May 4, 1987

CERTIFICATE OF SERVICE

I, Caroline Young, a secretary in the law firm of Keller and Heckman, do hereby certify that a copy of the foregoing REQUEST FOR EXTENSION OF TIME has been served this 4th day of May, 1987, by mailing U.S. First-Class, postage prepaid, to the following:

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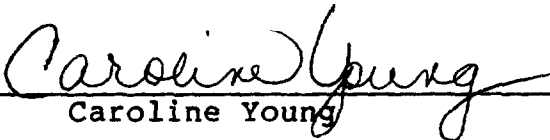
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